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PUBLIC SERVICE COMMISSION

January 15, 2003

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Application by Verizon Maryland Inc., Verizon Washington, D.C. Inc., and Verizon West Virginia Inc., et. al., Pursuant to Section 271 of the Telecommunications Act of 1996 for Authorization to Provide In-Region, InterLATA Services in Maryland, Washington, D.C., and West Virginia, WCDocket No. 02-384.

Dear Ms. Dortch:

On January 9, 2003, the Public Service Commission of Maryland ("MDPSC") delivered one copy of the record from MDPSC Case No. 8921, *In the Matter of the Review by the Commission Into Verizon Maryland Inc.'s Compliance with the Conditions of 47 U.S.C. §271(c)*. The MDPSC has discovered that Attachments to docket items 234 and 235 were inadvertently omitted from the filing. Copies of the omitted documents are attached. The second copy of the record filed on January 13, 2003 was complete.

If you should have any questions, please do not hesitate to contact Tracey Stokes at (410) 767-8037 or Bernice Ammon at (410) 767-3556.

Sincerely,

Tracey L. Stokes
Assistant General Counsel

Enclosure

cc: Janice Myles, CPD/WCB
Gail Cohen, CPD/WCB
Gary Remondino, CPD/WCB

No. of Copies rec'd 014
List ABOVE

8921

Docket No. 234

Attachments

IN THE MATTER OF

VERIZON VIRGINIA INC.

CASE NO. PUC-2002-00046

To verify compliance with the
conditions set forth in 47 U.S.C. § 271(c)

REPORT OF ALEXANDER F. SKIRPAN, JR., HEARING EXAMINER

July 12,2002

On March 20,2002, the Commonwealth of Virginia State Corporation Commission (“Commission”) established this proceeding to verify whether Verizon Virginia Inc. (“Verizon Virginia”) meets the requirements of § 271(c) of the Telecommunications Act of 1996 (“Act”). Among other things, the Commission appointed and delegated to the Hearing Examiner “all authority vested in the Commission by the Constitution and Code of Virginia to conduct formal proceedings, including a public hearing, to consider the § 271 **filing** and all evidence in support and opposition thereto.” Further, the Commission directed the Bearing Examiner to **file** this report with the Commission on July 12,2002.² The format of this report is similar to that of other state § 271 consultative reports to the Federal Communications Commission (“FCC”).

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¹ *In the Matter of Verizon Virginia Inc.’s Compliance with the conditions set forth in 47 U.S.C. § 271(c)*, Case No. PUC-2002-00046, Preliminary Order on Verizon Virginia Inc.’s Compliance With the Conditions Set Forth in 47 U.S.C. § 271(c), at 4 (March 20,2002) (“**Preliminary Order**”).

² *Id.* at 9.

High Capacity Loops

At the heart of the issues raised by CLECs regarding **high** capacity loops, including **DS-I** and **DS-3** Loops, is Verizon Virginia's policy regarding what it considers "additional construction." **This** policy became more of an issue after Verizon Virginia began applying it rigorously in **mid-2001**.⁹⁴³ Verizon Virginia maintains that its policy is consistent with FCC rules that an ILEC is not required to construct new facilities or install additional equipment to provide unbundled DS-1 **Loops**.⁹⁴⁴ In its brief, Allegiance highlights that Verizon Virginia considers lack of facilities in relation to unbundled DS-I Loops to include: (i) no repeater shelf in the Central Office or customer location or remote terminal, (ii) no **apparatus/doubler** case available, and (iii) no riser cable or buried drop wire if a trench or conduit is not **provided**.⁹⁴⁵ Indeed, during the hearing Verizon Virginia **confirmed** that it will deny a CLEC's UNE DS-1 order for "no facilities" even when all that Verizon Virginia must to provide the requested service is open a cable sheath to splice existing pairs into an existing apparatus **case**.⁹⁴⁶ Allegiance asserts Verizon Virginia "routinely undertakes such minor upgrades to make DS-1s available to its retail end **users**."⁹⁴⁷ Allegiance also claims that Verizon stands alone among BOCs in regards to its no-facilities **policy**.⁹⁴⁸ For example, Allegiance reports that in May 2002, Verizon rejected **23%** of Allegiance's **UNE DS-1** orders, whereas all other BOCs combined rejected only **3%** of Allegiance's **UNE DS-1** orders during the same **period**.⁹⁴⁹

The Virginia metrics Guidelines and the New Guidelines do not measure the number of UNE-DS-1 orders turned back for no facilities. However, Verizon Virginia witness Nogay testified that according to Verizon Virginia's own studies, between 10% and **30%** of all **UNE** high capacity loop orders are turned back for no **facilities**.⁹⁵⁰

CLECs complain that under Verizon Virginia's policies, they are required to follow **an** arduous and expensive three-step process to obtain unbundled DS-I Loops?" First, the CLEC orders UNE DS-1 and has its order rejected for no **facilities**.⁹⁵² The CLEC then must order the DS-1 facility **as** special access, at a significantly higher cost?" Finally, the CLEC then converts the special access to a **UNE DS-1 Loop**.⁹⁵⁴ Cavalier estimates that the normal inte

⁹⁴³ **See**, Exhibit No. 47.

⁹⁴⁴ Exhibit No. 8, at ¶ 79.

⁹⁴⁵ Allegiance Brief at 2; Exhibit No. **52**, at **4**.

⁹⁴⁶ Nogay, Tr. at 819, 822.

⁹⁴⁷ Allegiance Brief at **3**.

⁹⁴⁸ *Id.* at **2**.

⁹⁴⁹ *Id.*; Exhibit No. 52, at 7; Best, Tr. at **933**.

⁹⁵⁰ Nogay, Tr. at 824-25.

⁹⁵¹ Cavalier Brief at 6-7; AT&T Brief at 82; Allegiance Brief at **4-5**.

⁹⁵² *Id.*

⁹⁵³ *Id.*

⁹⁵⁴ *Id.*

provision a UNE DS-I Loop order is 18 days, while the three-step process takes 54 days.⁹⁵⁵ Indeed, NTELOS suggests that Verizon Virginia institute a special process whereby CLECs can indicate on their orders that if facilities are not available for a UNE DS-1, Verizon Virginia should automatically convert the order to special access and automatically convert it back to UNE DS-1 as soon as the UNE DS-1 becomes an option.⁹⁵⁶ As Allegiance witness Best testified, changing a UNE DS-I order into a special access DS-I order increases the nonrecurring charge from \$72.00 to \$355.00 and increases monthly costs from \$127.42 to \$198.24.⁹⁵⁷

On brief, Verizon Virginia insists that in the Verizon *New Jersey Order*, the FCC “flatly rejected” Allegiance’s complaint regarding Verizon Virginia’s no construction policy.” Specifically, the FCC found

XO and Allegiance also argue that Verizon rejects competitive LEC UNE orders under its “no facilities” policy when any “necessary” facilities are Unavailable. Verizon explains that it provides unbundled high capacity loops where facilities are available, and that it will also provide competitive LECs with unbundled high capacity loops where not all necessary facilities are available, but the central office common equipment and equipment at the end user’s location necessary to create a high capacity loop can be accessed. This is the same policy the [FCC] found not to expressly violate the [FCC’s] unbundling rules in our Verizon Pennsylvania Order.⁹⁵⁹

Moreover, Verizon Virginia points out that the FCC is currently reviewing LECs’ obligation to provide unbundled network elements, including the question of the precise extent to which LECs are required to modify their existing networks to provide access to network elements.⁹⁶⁰ According to Verizon Virginia that is the proper venue for issues like those raised regarding no facilities for UNE DS-I.⁹⁶¹

⁹⁵⁵ Exhibit No. 37.

⁹⁵⁶ NTELOS Brief at 5.

⁹⁵⁷ Exhibit No. 52, at 3-4. The \$127.42 amount is based on the Density Cell 1 DS-I Loop rate of \$110.61 plus the crossconnect charge of \$16.81.

⁹⁵⁸ Verizon Brief at 33.

⁹⁵⁹ *Verizon New Jersey Order* at ¶ 151 (footnotes omitted).

⁹⁶⁰ Verizon Virginia Brief at 33; See, Notice of Proposed Rulemaking, *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Development of Wireline Services Offering Advanced Telecommunications Capability*, 16 FCC Rcd 22781, ¶ 63 (2001).

⁹⁶¹ Verizon Virginia Brief at 33-34.

Based on the *Verizon New Jersey Order*, Verizon Virginia's "no facilities" policy is compliant with FCC rules and thus, I find that Verizon Virginia's provision of high capacity loops meets the requirements of Checklist Item 4.

However, I find that to fulfill our consulting role the Commission should advise the FCC that Verizon Virginia's policy has a ~~significant and adverse effect on competition in~~ Virginia, is inconsistently applied across UNEs, ~~is at odds with industry accounting rules, and is~~ inconsistent with TELRIC-pricing principles.

From November 2001 through March 2002, Verizon Virginia confirmed orders for UNE DS-Is that if provisioned, would have provided the equivalent capacity of 117,240 voice grade circuits.⁹⁶² Cavalier calculates its UNE DS-I rejection rate to be 39%.⁹⁶³ To put this level of activity in perspective, during this same five-month period, Verizon Virginia reported actual access line growth for CLECs in Virginia to be 116,652.⁹⁶⁴ These calculations indicate that UNE DS-1 Loops are significant to competition in Virginia. Furthermore, Cavalier and Allegiance demonstrate that denied access to UNE DS-Is hurt their ability to compete as this increases both the time and cost to provide service. I note that Case Nos. PUC-2001-00166 and PUC-2001-00176 concerned complaints by Broadslate Networks of Virginia, Inc., and 360 Communications Company of Charlottesville d/b/a ALLTEL regarding the provisioning of high capacity loops. While these complaints were withdrawn, it is significant that neither company operates as CLECs in Virginia today.

In addition, Verizon Virginia's application of what it considers construction appears to be inconsistently applied across UNEs. For example, during the hearing, Verizon Virginia confirmed that for UNE Loops, Verizon Virginia would provision the loop to a CLEC even if it is necessary for Verizon Virginia to add a new drop to a new home.⁹⁶⁵ This appears to be at odds with its strictly enforced policy for UNE DS-I Loops. In addition, Verizon Virginia stated that it would make cable pairs available through line station transfers, but following its "no construction" policy, Verizon Virginia will not splice any of those available pairs into existing repeater cases.⁹⁶⁶

⁹⁶² Derived from CLEC orders reported for the five-month period for OR-1-04-3211, per Exhibit No. 101, at Appendix E-21; OR-1-06-3211, per Exhibit No. 101, at Appendix E-23; and OR-1-08-3211, per Exhibit No. 101, at Appendix E-25. CLEC orders for < 6 lines were counted as one DS-I, while CLEC orders for >= 6 were counted as 6 DS-Is. The total number of DS-Is was multiplied by 24 to determine equivalent voice grade circuits.

⁹⁶³ Exhibit No. 37.

⁹⁶⁴ Derived from subtracting the October 2001 Total Competitive Lines, per Exhibit No. 54, from the March 2002 Total Competitive Lines, per Exhibit No. 54.

⁹⁶⁵ Nogay, Tr. at 829.

⁹⁶⁶ Verizon Virginia's Loops Panel, Tr. at 818-19; Exhibit No. 47.

Verizon Virginia's classification of opening a cable sheath to splice existing cable pairs into an existing apparatus case as construction for purposes of UNE DS-I Loops is in conflict with the FCC's established accounting rules. Specifically, 47 C.F.R. § 32.5999(b)(3) states:

The Plant Specific Operations Expense accounts shall include the cost of. . . replacing items of plant other than retirement units; rearranging and changing the location of plant not retired

Thus, ~~from~~ an accounting perspective, the rearrangement of existing facilities. ~~such as~~ opening a cable sheath to splice existing cable pairs into ~~an~~ existing apparatus case should be accounted for as an expense and not as a capital item. Likewise, ~~from~~ an unbundling perspective, such rearrangements should not be treated as construction. Verizon Virginia offered no testimony reconciling accounting and unbundling treatment of these activities. For example, Verizon Virginia's Loops Panel could not address the application of the FCC accounting rules in regards to the rearrangement of existing facilities.⁹⁶⁷

Finally, TELRIC pricing models, at least as applied by this Commission, include growth and fill factors.⁹⁶⁸ Such models are based on a fundamental assumption that the ILEC's network will grow to meet forecasted demand in Virginia. Fill factors reflect that a certain level of spare plant will continuously remain available to meet demand, and the costs associated with this plant are included in the TELRIC-based rates. Verizon Virginia's "no facilities" policy appears at odds with the development of TELRIC models because it appears to adopt a short-run assumption that no new plant is constructed to meet demand from CLECs. In other words, high capacity facilities are provided only when spares happen to be available to fill CLEC orders.

5. Conclusion

Based on the record and applicable FCC precedent, I find that Verizon Virginia provides local loop transmission from the central office to the customer's premises, unbundled from local switching or other services in accordance with the requirements of Checklist Item 4. However, Verizon Virginia's "no facilities" policy should be revised to require rearrangement and connection of existing facilities for all CLEC UNE Loop orders. Furthermore, the FCC should analyze and-adjust its TELRIC pricing models to be consistent with the implemented "no facilities" policy.

E. Checklist Item 5 - Unbundled Local Transport

Section 271(c)(2)(B)(v) requires Verizon Virginia to provide "[l]ocal transport from the trunk side of a wireline local exchange carrier switch unbundled from switching or other services."

⁹⁶⁷ Verizon Virginia's Loops Panel. Tr. at 827.

⁹⁶⁸ See, *Virginia Pricing Case* at 226-29.

II. EXECUTIVE SUMMARY

Based on the record and arguments described herein, I recommend that the Commission advise the FCC that this Commission supports granting Verizon Virginia authority to provide in-region interLATA services in Virginia. Verizon Virginia currently complies with each of the fourteen Checklist Items listed in § 271(c)(2)(B) and has met its § 271(c)(1)(A) obligation to enter into interconnection agreements with competitive local exchange carriers (“CLECs”). As of March 2002, CLECs controlled approximately 17.4% of the access lines within the Commonwealth, including 26.8% of all business lines and almost 10% of all residential lines.³ Indeed, during 2001, the number of CLEC access lines in Virginia grew by 227,500, while the number of Verizon Virginia access lines declined by over 188,100.⁴

As described below, CLECs challenged Verizon Virginia’s compliance with nearly every one of the fourteen Checklist Items. However, many of the issues raised concerned matters pending in other proceedings before the FCC. Based on the multitude of issues pending before the FCC, some parties questioned this Commission’s standing to offer a recommendation on checklist compliance to the FCC. Rather than focusing on matters pending before the FCC, this report and analysis focus on currently effective interconnection agreements and prices approved by this Commission. In addition, determinations of checklist compliance in this proceeding are based on actual commercial performance by Verizon Virginia, third-party testing, and FCC decisions in other Verizon § 271 proceedings. For example, significant weight is given to prior FCC findings where the Verizon Virginia systems under review here are the same systems the FCC found to be checklist compliant in prior proceedings.

CLECs also raised a number of issues related to specific problems encountered in transacting business with Verizon Virginia that affect the quality of service the CLEC is able to provide to its own customers. In recent cases, the FCC has set a high threshold for dealing with specific CLEC complaints in § 271 proceedings, and has directed such issues to separate complaint or arbitration proceedings. The general standard used for checklist compliance is whether an efficient CLEC has a reasonable opportunity to compete. Nonetheless, during the course of this proceeding, Verizon Virginia either instituted or agreed to implement system fixes designed to address some of the issues raised by CLECs. In several instances, Verizon Virginia’s commitments are noted as a basis for the determination of checklist compliance.

The Commission has established a detailed set of performance guidelines or metrics, an ongoing industry collaborative to update and change metrics, and is in the final stages of adopting a performance assurance plan to provide remedies to CLECs when Verizon Virginia fails to meet certain defined performance standards. This process is the primary means for the Commission to regulate continued checklist compliance by Verizon Virginia and for CLECs to address specific operational problems that may arise in their relationship with Verizon Virginia.

³ Exhibit No. 54.

⁴ Exhibit No. 56.

Two of the more controversial Checklist Items were Checklist Item 4, unbundled local loops, and Checklist Item 8, white page directory listings. In regards to unbundled local loops, especially concerning unbundled ~~DS-I~~ Loops, CLECs complained that Verizon Virginia's policy by which it determines the availability of facilities to meet CLEC requests was too restrictive. Verizon Virginia is not required by the Act or the FCC to construct facilities to meet CLEC demands for unbundling. However, CLECs maintained that some activities, which Verizon Virginia classifies as additional construction, are only maintenance. CLECs are thus forced to purchase the same facilities as special access at much higher prices. Because the FCC has approved the same Verizon policy in other recent § 271 applications, Verizon Virginia's policy was found to be checklist compliant in Virginia. Nonetheless, I find Verizon Virginia's policy has a significant and adverse effect on competition in Virginia, is inconsistently applied across UNEs, is at odds with industry accounting rules, and is inconsistent with the pricing of unbundled elements. I recommend that the Commission in its consulting role so advise the FCC.

As to white page directory listings, Verizon Virginia meets this Checklist Item based on recent improvements to its directory listings process and on its commitment to work with CLECs within the Change Management process on certain other requested system enhancements. Specifically, I recommend adding Commission support to Cox's requested improvements to the Line Verification Report. Further, checklist approval should not end other Commission initiatives underway to monitor and improve the directory listings process.

**OSS Reply Declaration
On Behalf of Verizon Maryland Inc.**

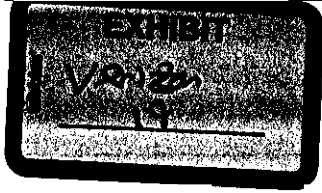
Revised Paragraph 136



136. The results of these efforts have been significant. Verizon MD has conducted special studies analogous to BI-3-04, % CLEC Billing Claims Acknowledged within 2 Business Days, and BI-3-05, % CLEC Billing Claims Resolved within 28 Calendar Days after Acknowledgement. Verizon MD has achieved an acknowledgement rate in July through September 2002, of more than **97.9%** acknowledged in two business days, and a resolution rate in July through September 2002, of more than **99.2%** of claims resolved within 28 calendar days of acknowledgement.

Table B-1: BI-3-04 and BI-3-05 Special Study

BI-3-04	July	Aug	Sep	BI-3-05	July	Aug	Sep
Num.	211	205	241	Num.	152	194	181
Den.	211	205	255	Den.	152	198	181
Result	100%	100%	94.51%	Result	100%	97.98%	100%



Example of 10-30-10 records on the Other Charges and Credits record
TNs identified **in bold**

PA

BROWSE PXHBM.BDT.R7434.PA020813

Line 00000042 Col 001 080

Command ==>

Scroll ==> CSR

```

-----1-----2-----3-----4-----5-----6-----7-----8
1030100007434 2002081321512910009990003000000019          TN 2155

```

```

-----9-----0-----1-----2-----3-----4-----5-----6
794980                                999                0100

```

```

-----7-----8-----9-----0-----1-----2-----+

```

MD

BROWSE PXHBM.BDT.RWUA.MD020913.B

Line 00001855 Col 001 080

Command ==>

Scroll ==> CSR

```

-----1-----2-----3-----4-----5-----6-----7-----8
1030100000WUA 2002091300006147561520001000001855          TN 3013

```

```

-----9-----0-----1-----2-----3-----4-----5-----6
102691527                                999                0100

```

```

-----7-----8-----9-----0-----1-----2-----+

```



EXHIBIT

tabbies

WCOM 3

CONTACT NAME	PHONE #
_____	_____

MASTERBANK BTN STATE

ACCT MARKET _____ Resale _____ Unbundling _____ Platform _____ TYPE _____ Res _____ Bus _____ Coin _____
(Select One) (Select One)

CLAIM REASON (Select only one) ELK _____ DA _____ DISC _____ DUPE _____ INB _____ INQ _____ LIST _____ LPC _____ NRC _____ NRES _____

RATES _____ RC _____ RSD _____ SBT _____ TAX _____ UNK _____ USG _____ USOC _____ 3PB _____

TOTAL CLAIM AMOUNT:[illegible]

¹ Please see the 'Reason Codes' tab to obtain the additional requirements necessary to process a particular claim type.

Docket No. 235

8921

Attachments

VERIZON WEST VIRGINIA

CASE NO. 02-0809-T-P

RESPONSE TO AT&T'S SIXTH SET OF DATA REQUESTS
September 19, 2002

- 6-5 Regarding VZ-WV's response to AT&T 2-34, please indicate changes in the number of VZ personnel in Verizon's wholesale services organizations in 2001 and 2002.

Response:

As of December 31, 2001, the Verizon Wholesale Services organization had approximately 11,000 employees. As of August 31, 2002, the Verizon Wholesale Services organization had approximately 10,000 employees. Please note that these Wholesale Organization numbers do not include the tens of thousands of additional field employees who service both retail and wholesale customers.

David A. Hill
Vice President & General Counsel


verizon

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Baltimore, MD 21202

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October 7, 2002

Hand Delivered

Felecia L. Greer
Executive Secretary
Public Service Commission of Maryland
William Donald Schaefer Tower
6 St. Paul Street, 16th Floor
Baltimore, Maryland 21202-6806

Re: Case No. 8916

FILED
OCT 07 2002
PUBLIC SERVICE COMMISSION
OF MARYLAND

Dear Ms. Greer:

In Order No. 77988 (August 30, 2002), the Public Service Commission of Maryland ("Commission") directed Verizon Maryland Inc. ("Verizon MD") to include in Appendix H of the "Maryland Carrier-to-Carrier Guidelines Performance Standards and Reports" ("MD Guidelines") the following provision: "Verizon shall provide CLECs with at least thirty (30) days notice of any deletions of order types that flow-through." I am writing to advise you that Verizon MD found it necessary on October 4, 2002 to remove from the list of order types that flow-through CLEC orders for a partial migration of the service (including the billing telephone number) of a multi-line customer from Verizon MD to a CLEC ("CLEC Partial Migration-BTN Orders"). CLECs were given notice of this action on October 3, 2002 through Verizon MD's Operations Support System ("OSS") change notice process.

On August 19, 2002, Verizon MD implemented changes to its systems and ordering processes that were intended to permit order "flow-through" for CLEC Partial Migration-BTN Orders. Orders that "flow-through" are electronic CLEC orders that flow electronically from Verizon MD's OSS interface to its Service Order Processor without intervention by Verizon MD personnel.

Unfortunately, the changes to Verizon MD's systems and ordering processes that were intended to permit "flow-through" for CLEC Partial Migration-BTN Orders have not operated

properly. Since the changes were implemented, many of these orders have “fallen out” of Verizon MD’s ordering and provisioning systems and required manual handling. CLECs have been submitting complaints to Verizon MD concerning delays and errors in the orders.

In order to provide CLECs with ~~an~~ improved quality of service and to process CLEC Partial Migration-BTN Orders in a timely manner and without errors, Verizon MD has found it necessary to return this type of order to its pre-August 19 status as a type of order that is not designed to flow-through. This action will not adversely affect provisioning intervals since the standard provisioning interval for manually handled CLEC Partial Migration-BTN Orders will be *the* same as the standard provisioning interval for these orders as “flow-through” orders.

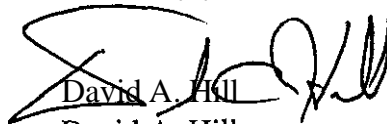
Since August 19, Verizon MD has processed **only** about **45** CLEC Partial Migration-BTN Orders. **Thus**, the overall impact on CLEC ordering ~~from~~ restoring ~~this~~ type of order to its pre-August 19 **status as** a type of order that is not designed to flow-through will be minimal. Indeed, the reversion of CLEC Partial Migration-BTN Orders to their pre-August 19 status as a type of order that is not designed to flow-through is in actuality only a nominal change since the change to “flow-through” as a practical matter never was successfully implemented and many of the orders continued to be manually handled.

When Verizon MD became aware that CLEC Partial Migration-BTN Orders were not being properly processed on a flow-through basis, Verizon MD began the work necessary to correct the system and process problems. However, to date, Verizon MD has not been able to correct these problems. Although Verizon MD is hopeful that it will be able to implement order flow-through for CLEC Partial Migration-BTN Orders, at present, it is not able to state when this will be accomplished.

Should the Commission deem it necessary for Verizon MD to seek a waiver of the 30 day advance notice requirements of Order No. 77988 and Appendix H of the MD Guidelines for restoration ~~of~~ CLEC Partial Migration-BTN Orders to their pre-August 19 status as a type of order that does not flow-through, Verizon MD hereby requests that the Commission grant such a waiver. As explained above, in order for Verizon MD to provide proper handling of CLEC Partial Migration-BTN Orders, it was necessary for Verizon MD to act without further delay to restore these orders to their pre-August 19 status.

If you have any questions concerning this matter, please do not hesitate to contact me.

Very truly yours,



David A. Hill

DAH/mlw

cc: All Parties of Record